

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach

Craig R. Anderson, Esq.

Nevada Bar No. 6882

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

canderson@maclaw.com

jnichols@maclaw.com

Attorneys for Defendants Las Vegas Metropolitan

Police Department, Sheriff Joseph Lombardo,

Andrew Bauman, Matthew Kravetz, Supreet Kaur,

David Jeong, and Theron Young

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PHILLIP SEMPER, an individual; COREY
JOHNSON, an individual; ASHLEY
MEDLOCK, an individual; CORY BASS, an
individual; MICHAEL GREEN, an
individual; DEMARLO RILEY, an
individual; BREANNA NELLUMS, an
individual; CLINTON REECE, an individual;
ANTONIO WILLIAMS, an individual;
LONICIA BOWIE, an individual; CARLOS
BASS, an individual; and DEMETREUS
BEARD, an individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
SHERIFF JOSEPH LOMBARDÓ,
individually and in his official capacity as
Sheriff of the Las Vegas Metropolitan Police
Department; ANDREW BAUMAN,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; MATTHEW KRAVETZ,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; SUPREET KAUR, individually and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; DAVID JEONG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; THERON YOUNG, individually and

Case Number:
2:20-cv-01875-JCM-EJY

STIPULATION AND ORDER TO STAY
CASE PENDING SETTLEMENT
DISCUSSIONS

(SECOND REQUEST)

1 in his capacity as a Las Vegas Metropolitan
 2 Police Department Officer; CAESARS
 3 ENTERTAINMENT CORPORATION
 4 D/B/A RIO ALL-SUITES HOTEL; RIO
 5 PROPERTIES, LLC; JOHN CARLISLE,
 6 individually and in his capacity as an
 7 employee of the Rio Hotel & Casino; DOE
 8 LVMPD GANG TASK FORCE OFFICERS
 9 1-10; DOE LVMPD OFFICERS 1-10; DOE
 10 LVMPD SUPERVISORS 1-5; DOE RIO
 11 EMPLOYEES 1-10,

12 Defendants.

13 **STIPULATION AND ORDER TO STAY CASE PENDING SETTLEMENT**
 14 **DISCUSSIONS**

15 **(SECOND REQUEST)**

16 Plaintiffs Phillip Semper, Corey Johnson, Ashley Medlock, Michael Green, Demarlo
 17 Riley, Clinton Reece, and Lonicia Bowie, by and through their counsel of record,
 18 Christopher M. Peterson, Esq., of American Civil Liberties Union of Nevada, and
 19 Defendants, the Las Vegas Metropolitan Police Department (the “Department” or
 20 “LVMPD”), Sheriff Joseph Lombardo (“Lombardo”), Andrew Bauman (“Bauman”),
 21 Matthew Kravetz (“Kravetz”), Supreet Kaur (“Kaur”), David Jeong (“Jeong”), and Theron
 22 Young (“Young”), collectively (“LVMPD Defendants”), by and through their counsel of
 23 record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, hereby
 24 stipulate and agree to stay all pending deadlines so that Plaintiffs and LVMPD Defendants
 25 can enter into settlement discussions and negotiations without incurring additional attorney’s
 26 fees and costs. This Stipulation is being entered in good faith and not for purposes of delay.

27 1. Throughout the instant litigation, counsel for the LVMPD Defendants and
 identified Plaintiffs have informally discussed the possibility of settlement.

2. At this stage, LVMPD Defendants and the identified Plaintiffs have
 conducted some discovery and now wish to explore the possibility of settlement without
 incurring additional time and expense litigating the instant matter.

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 3. As such, LVMPD Defendants and the identified Plaintiffs hereby agree and
2 request the Court enter a stay of all deadlines in the instant case previously set for February
3 15, 2022. The parties ask to extend the current stay until March 1, 2022, so that LVMPD
4 Defendants can review Plaintiffs' settlement offer.

5 4. This is the second request for a stay for purposes of settlement negotiations.

6 5. The identified Plaintiffs and LVMPD Defendants further agree and stipulate
7 that the stay does not effect any pending or outstanding written discovery responses and
8 such responses are due in accordance with the Federal Rules of Civil Procedure.

9 6. The identified Plaintiffs and LVMPD Defendants further agree that the re-
10 scheduling of any and all depositions is stayed until March 1, 2022.

11 7. Notwithstanding the stay, the identified Plaintiffs and LVMPD Defendants
12 intend to and hereby agree to cooperate in the exchange of information as needed to
13 facilitate settlement.

14 ...

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

8. If the parties do not reach a settlement during the stay, the parties further agree and stipulate that the parties will submit a new proposed Discovery plan to the Court within fourteen (14) days of the expiration of the stay. The parties agree that the new proposed Discovery Plan must provide, at a minimum, the same number of days to complete the parties' outstanding obligations, including amending the complaint and disclosing expert witnesses, as the current Discovery Plan but for the implementation of the stay provided by this stipulation.

IT IS SO STIPULATED.

Dated this 14th day of February, 2022
AMERICAN CIVIL LIBERTIES UNION
OF NEVADA

Dated this 14th day of February, 2022
MARQUIS AURBACH

By: /s/ Christopher M. Peterson
Christopher M. Peterson, Esq.
Nevada Bar No. 13932
601 South Rancho Drive, Suite B-11
Las Vegas, Nevada 89106
Attorneys for Plaintiffs Phillip Semper,
Corey Johnson, Ashley Medlock,
Michael Green, Demarlo Riley, Clinton
Reece, and Lonicia Bowie

By: /s/ Jackie V. Nichols
Craig R. Anderson, Esq.
Nevada Bar No. 6882
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants Las Vegas
Metropolitan Police Department,
Sheriff Joseph Lombardo, Andrew
Bauman, Matthew Kravetz, Supreet
Kaur, David Jeong, and Theron Young

ORDER

IT IS SO ORDERED this 14th day of February, 2022.


UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816